

EXHIBIT B

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May 15, 2012

VIA ELECTRONIC MAIL

Eric Evans, Esq.
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Palo Alto, CA 94306-2112

**Re: *In re: High-Tech Employee Antitrust Litigation,*
Master Dkt. No. 11-cv-2509 (N.D. Cal.)**

Dear Mr. Evans:

I write on behalf of Plaintiffs in the above-captioned matter in response to Google Inc's ("Google") continuing production of data responsive to Plaintiffs' requests. We have analyzed Google's most recent production of data on May 9, 2012, as well as Google's written responses to some of Plaintiffs' data questions. Enclosed with this letter is Exhibit 1a—essentially an updated version of the Exhibit 1 to my May 8, 2012 letter to Lee Rubin—which provides further details regarding categories of data that have not yet been produced, as well as questions regarding the data that have been produced.

First, you wrote in your May 9, 2012 letter that Google is producing documents on a rolling basis. Given the importance of this data and the impending class certification deadlines, it is imperative that Google finish producing all of the requested data immediately. Please let us know by tomorrow, May 16, 2012, whether Google has finished producing the requested data, and if not, by what date Google's data production will be complete.

Second, Exhibit 1a lists certain fields relating to cold calling and outside offer activity that have not been produced and that were included in Plaintiffs' requests for production and Plaintiffs' May 8, 2012 correspondence. Please provide these additional fields immediately.

Eric Evans, Esq.

May 15, 2012

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Third, Exhibit 1a contains a list of remaining questions concerning Google's data production. Again, given the nature and scope of Plaintiffs' questions, Plaintiffs believe that the most productive way to address the data questions would be through a teleconference involving Plaintiffs' counsel, a staff member of Plaintiffs' consulting expert, and a representative of Google who is knowledgeable about the data produced by Google. Please propose a time this week when Google will make available a person knowledgeable about the data produced in this litigation for such a teleconference.

Thank you, and please feel free to contact me with any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dan Walker", with a long horizontal flourish extending to the right.

Daniel J. Walker

cc: Dean Harvey

Enclosure

Exhibit 1a to May 15, 2012 Walker Letter

I. Employee Data Questions & Issues Relating to GOOG-HIGH TECH-00057188-Coimpensation_data.

- A. The data do not show changes in job titles over the years. Does the job title indicate the most recent position held by an employee? If not, what does the field "job_title" represent? Please produce data at the employee, salary, and job title level with information identifying title change dates or salary change dates.
- B. There are 36,390 observations where the below fields are missing. Please explain why values for these fields are missing while the fields "hire_date" and those containing salaries are always populated in these observations. If the data are available, please provide populated fields for those observations.
1. p.tax_id_hash
 2. percent_full_time
 3. job_title
 4. job_grade
 5. job_family
 6. work_location
 7. work_status
 8. comp_region_code
 9. mrp
 10. mrp_currency
 11. bonus_target
 12. equity_guideline
- C. Does the field "location_code" reflect the actual geographic location of the employee?
- a. There are 36, 369 observations where the field "location_code" is missing. What do the missing values represent? If possible, please provide a populated field for the missing observations.
 - b. What does a value of "1732" in the field "location_code" represent?
- D. Define each of the following values found in the field "work_status":
- a. NEW_HIRE-DELETE

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- b. NEW_HIRE-NO_SHOW
- E. In the observations where “work_status” has the values “NEW_HIRE_DELETE” or “NEW_HIRE_NO_SHOW,” the salaries are missing for all years. Does this indicate that these employees have never been employed by Google?
 - F. Please explain how to interpret observations where the field “term_date” is populated but the field “work_status” is equal to “ACTIVE.”
 - G. Please explain how to interpret observations where the field “work_status” is equal to “TERMED,” but the field “term_date” is not populated.
 - H. There are 16,593 observations where the value for the field “work_status” is missing but the field “term_date” has a non-missing termination date. Does a non-missing termination date indicate that the employees are no longer employed by Google? If not, what does this indicate regarding the work_status for these observations?
 - I. For some observations, the amounts in the fields reflecting salaries are very low (e.g., \$11, \$15, \$17, \$50, etc.). Do these represent hourly rates? If yes, please explain how one would identify salaried and non-salaried employees. If the data provided are not sufficient to do so, please produce data fields that identify whether employees are salaried or non-salaried, as well as the hours they worked.
 - J. What the field “mrp” represent?
 - K. There are 37,957 observations where the field “mrp” is missing. What does this indicate regarding these observations? If possible, please provide a fully populated “mrp” field.
 - L. There are 133 observations where the field “mrp” is missing but the field “mrp_currency” is not missing. What do these observations represent?
 - M. Please explain what the field “bonus_target” represents and how to interpret the values in the field.
 - N. Most observations in the field “bonus_target” reflect a percent value. However in 134 observations, the field “bonus_target” reflects other values such as “1.00E+00,” “1.50E+00,” “2.50E+00,” and “4.00E+00.” What do these values represent?
 - O. There are 37,824 observations where the field “bonus-target” is not populated. Please explain what having a missing value for “bonus_target” represents. If available, please provide a fully populated update of the field.
 - P. The file “GOOG-HIGH TECH-00057188-Compensation_data” contains 44,296 more unique “person_id_hash” than the hiring data file “GOOG-HIGH TECH-

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00054553-Employee_data.” Please explain why those employees are not found in the file “GOOG-HIGH TECH-00054553-Employee_data.”

- Q. There are 6,163 employees found in the file “GOOG-HIGH TECH-00054553-Employee_data” not found in “GOOG-HIGH TECH-00057188-Compensation_data.” Why is this so?
- R. The compensation dataset and the employee dataset have 19,490 common instances of the field “person_id_hash.” However, the two datasets only have 17,115 common instances where the files are matched by “person_id_hash” and “hire_date.” Why are hire dates different for some employees in the two datasets?

II. Employee Data Questions & Issues Relating to GOOG-HIGH TECH-00057189-Grant-data.

- A. The values for the field “job grade” in the file “GOOG-HIGH TECH-00057189-Grant_data” are a subset of those found in “GOOG-HIGH TECH-00057188-Compensation_data.” Does that mean that employees without the job grades included in the stock option grant data do not receive stock options? If not, please provide additional grant data for all employees.
- B. Please explain how to determine from this file which employees were granted options and which ones exercised those options.

III. Please provide the additional fields requested below:

1. Previous employer
2. Compensation at previous employer
3. Birth date
4. Gender
5. Education level and institution
6. Channel of hiring (e.g., cold call by recruiter, applied on website, on-campus recruiting, etc.)
7. Manager or manager ID
8. Reason for leaving (if applicable)
9. New employer (if applicable)
10. Bonus, benefits, and stock options at new employer (if applicable)
11. Variables relating to outside offer activity:

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- i. Name or unique applicant identifier of employee with offer
- ii. Date on which employee reports being approached
- iii. Manner approached (telephone call, email, etc.)
- iv. Education (e.g., engineering undergraduate, engineering graduate degree, MBA, etc.)
- v. Position held
- vi. Date employee brings an offer to the company and asks for a response
- vii. Name of competing firm(s)
- viii. Position offered
- ix. Competitor compensation offered
- x. Outcome (e.g., raise (amount, no adjustment, left for another job, stayed, etc.)